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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	PLAINTIFF	CASE NUMBER
v.		CR 10-00567-MMM-13
SARA EMERT,	DEFENDANT.	APPLICATION FOR REVIEW/RECONSIDERATION OF ORDER SETTING CONDITIONS OF RELEASE/DETENTION (18 U.S.C. §3142) AND REQUEST FOR HEARING

Application is made by plaintiff defendant SARA EMERT
 that a hearing be held to review /reconsider the decision of

United States District Judge _____ by order dated: _____
 Magistrate Judge JAY C. GANDHI by order dated: June 10, 2010

denying release and imposing detention under subsection (d) or (e) of Title 18 U.S.C. §3142; or
 ordering release upon certain conditions, or
 denying detention.

This application is made pre-sentence post-sentence based on the following facts not previously considered by said judicial officer or changed circumstances as follows:

Additional bail resource (home) which defendant is 25% owner, is now available to secure her attendance in this case. Previously her grandmother and father offered to post unsecured bonds. Her grandmother has owned her current home for 50 years, but recently lost her equity when she traded her home for a reverse mortgage. Ms. Emert's only prior conviction is for a DUI. She successfully completed diversion on another drug possession charge.

Relief sought (be specific):

Sara Emert is 7 months pregnant. She has been substance abuse free for several months. Her father and grandmother have already offered to post unsecured bonds. Now her 3 siblings have offered the home as collateral. Ms. Emert has a history of drug abuse and will require drug testing and counseling as a condition of her release in addition to other conditions to reasonably assure her attendance and the safety of her child and those around her.

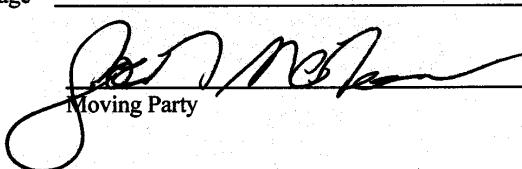
Counsel for the defendant and plaintiff United States Government consulted on June 14, 2010
 and opposing counsel declines to stipulate to an order providing the relief sought.

Telephonic notice given to AUSA Defendant's Counsel PSA Interpreter USM Probation
 on June 15, 2010.

An interpreter is required not required. Language _____
 Defendant is in custody not in custody.

June 15, 2010

Date


 Moving Party

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